

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CERTAIN UNDERWRITERS AT LLOYDS
OF LONDON, ISSUING POLICY NOS.
509/DL458805 and 509/DL460005,

Civil Action No.: 09 CV 4418
(RJH)(KNF)

Plaintiff,

NOTICE OF MOTION

-against-

ILLINOIS NATIONAL INSURANCE COMPANY,
INSURANCE COMPANY OF THE STATE OF
PENNSYLVANIA, et al.,

Defendants.

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PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, the Affidavit of Jason P. Gratt and Statement of Undisputed Facts Pursuant to Local Rule 56.1, Defendants, Illinois National Insurance Company ("Illinois National") and the Insurance Company of the State of Pennsylvania ("ICSOP"), will move this Court, before the Honorable Richard J. Holwell, United States District Judge, at the United States Courthouse for the Southern District of New York located at 500 Pearl Street, New York, New York as soon as counsel may be heard, for an order pursuant to Rule 56 of the Federal Rules of Civil Procedure granting summary judgment in favor of Defendants Illinois National and ICSOP, dismissing the Plaintiff's Complaint.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: Basking Ridge, New Jersey
August 27, 2010

Respectfully submitted,

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